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RM/vd 2012R00648

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

2013 JAN 18 P 3:21

CLERK'S OFFICE
AT BALTIMORE

UNITED STATES OF AMERICA

v.

RYAN LOHR,

Defendant.

*
*
* CRIMINAL NO. JKB-13-031 JY
*
* (Conspiracy, 18 U.S.C. § 371)
*
*

INFORMATION

The United States Attorney for the District of Maryland and the Assistant Attorney General for the Civil Rights Division of the United States Department of Justice charge that:

COUNT ONE

Defendant and Other Entities

At all times material herein:

1. Roxbury Correctional Institution (hereinafter "RCI") was a facility of the Maryland Department of Public Safety and Correctional Services.
2. Defendant **RYAN LOHR** was a Correctional Officer at RCI in Hagerstown, Maryland, in the District of Maryland.
3. KD was an inmate at RCI.
4. On March 9, 2008, during the 7:00 a.m. to 3:00 p.m. shift ("dayshift"), defendant **LOHR** was on duty and was assigned to the medical dispensary at RCI. The medical dispensary is located in the same building as the Administrative Segregation Intake Area, commonly referred to as ASIA.
5. On March 9, 2008, inmate KD was in a cell in ASIA. Defendant **LOHR** walked over to ASIA and met with other correctional officers who had gathered in ASIA to assault inmate KD, who

had previously assaulted a correctional officer. Defendant **LOHR** opened the door to inmate KD's cell to allow other correctional officers to assault inmate KD in retaliation for the previous attack on an officer. Defendant **LOHR** watched from the cell door as correctional officers entered the cell and beat inmate KD. Officers struck inmate KD on his head, face, and body with fists and kicks.

The Charge

6. From on or about March 9, 2008, through on or about at least November 2, 2012, in the District of Maryland, defendant

RYAN LOHR,

willfully combined, conspired, and agreed with other known RCI correctional officers and supervisors to commit an offense against the United States; that is, to obstruct justice and destroy evidence, in violation of 18 U.S.C. §§ 1512 and 1519.

Object and Manner and Means of the Conspiracy

7. It was the plan and purpose of the conspiracy that defendant **LOHR** and his co-conspirators would provide investigators with false and misleading information about the March 9, 2008, beating of inmate KD, and would cover up other information in order to ensure that their roles in the assault on inmate KD would not be discovered, and that the involved dayshift officers would therefore be shielded from liability.

Overt Acts

8. In furtherance of the conspiracy, and to effect the objects thereof, defendant **LOHR** and his co-conspirators committed the following overt acts, among others, in the District of Maryland:

The False Story

a. After defendant **LOHR** realized that there would be an investigation into the March 9, 2008, assault on inmate KD, defendant **LOHR** met at RCI with his co-conspirators, and agreed to provide investigators with false information to cover up the assault.

b. At one meeting, Officer TH said that the group should tell investigators that they did not see, hear, or do anything.

c. Defendant **LOHR** told his co-conspirators to tell investigators that they did not see defendant **LOHR** in ASIA.

Destruction of Evidence

d. After the assault, defendant **LOHR** directed others to clean up the blood in inmate KD's cell rather than to preserve the blood as evidence.

e. After locating surveillance tapes that would have recorded the beating, supervisor ES announced that "he would take care of" the issue, and then waved what appeared to be a magnet over several surveillance tapes in order to erase the footage.

f. Supervisor ES then hid the magnetic device in the drop-ceiling.

g. After the assault on inmate KD, a supervisor – who previously had ordered an assault on inmate KD – instructed defendant **LOHR** and officer TH not to write any reports about inmate KD and his injuries.

False Statements to State Investigators

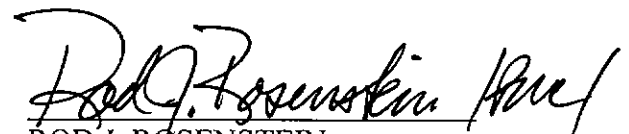
h. On or about March 10, 2008, when defendant **LOHR** met with RCI investigators, and on March 27, 2008, when defendant **LOHR** met with RCI and Maryland State Police ("MSP") investigators regarding the incident involving inmate KD, defendant **LOHR** concealed that he and

his co-conspirators were involved in a cover-up of the assault on inmate KD, and provided investigators with false and misleading statements about the beating.

i. Defendant **LOHR** contacted another officer who was not involved in the beating, and instructed that officer not to tell investigators that he knew **LOHR** had been in ASIA at the time of the assault on KD.

18 U.S.C. § 371.

1/18/13
Date



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